

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DAWN M. JENKINS,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 1:12-cv-10622-WGY
AFNI, INC.; DIVERSIFIED)	
CONSULTANTS, INC.;)	
EQUIFAX INFORMATION)	Electronically Filed
SERVICES, LLC, and EXPERIAN)	
INFORMATION SOLUTIONS, INC.,)	
)	
Defendants.)	
)	

MOTION FOR STIPULATED PROTECTIVE ORDER

COMES NOW Defendant Experian Information Solutions, Inc. ("Experian") and files this Motion for Stipulated Protective Order, and shows the Court as follows:

I.

In this suit, Plaintiff has alleged that Defendants violated the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* The nature of this action necessarily involves trade secrets and other confidential information of Defendants and personal and confidential information regarding Plaintiff.

II.

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Parties agree that good cause has been shown to protect certain documents and information which have been and may be sought, produced or exhibited by and among the parties to this action relating to trade secrets, confidential research, development, technology or other proprietary information belonging to the Defendants and/or personal income, credit and other confidential information of Plaintiff.

III.

The Parties have negotiated the terms of a mutually acceptable Stipulated Protective Order, which is being submitted to the Court as the proposed order on this motion.

WHEREFORE, PREMISES CONSIDERED, Experian respectfully requests that the Court enter the Stipulated Protective Order.

Respectfully submitted,
this 1st day of March, 2013,

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*Attorneys for Defendant
Experian Information Solutions, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of March, 2013, I caused the foregoing to be filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to counsel of record:

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*Attorneys for Defendant Equifax
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I further certify that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the 1st day of March, 2013, properly addressed as follows:

Ms. Dawn May Jenkins
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Lynn, MA 01902
Plaintiff

/s/ Maureen P. McAneny
Maureen P. McAneny (Admitted *Pro Hac Vice*)
*Attorney for Defendant Experian Information
Solutions*